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June 27, 2006

Bonnie Goldschlag, Assistant Director
Monmouth County Planning Board
Hall of Records Annex
One East Main Street
Freehold, NJ 07728

Dear Ms. Goldschlag:

The Office of Smart Growth (OSG) and our state agency partners have reviewed the Western Monmouth petition for Initial Plan Endorsement and would like to commend the County for its active participation and dedication to the Plan Endorsement process. However, consistency issues remain that need to be resolved before OSG can recommend this petition for endorsement by the State Planning Commission (SPC).

Overall, the County's plan was appropriate, comprehensive and well thought out. However, pursuant to N.J.A.C. 5:85-7.5(f), I would like to request additional information as outlined within this letter. This request is made in order to clarify some concerns and assist with the evaluation of your petition for consistency with the goals, policies and strategies of the State Development and Redevelopment Plan (State Plan).

I am requesting that the County provide this additional information within 90 days. If this suggested amount of time is not sufficient, please let us know and we will work with you to establish a reasonable timeline for submission of the requested information. Once the Office of Smart Growth receives the requested information, we will renew our consistency review of the Western Monmouth petition and prepare a report for the State Planning Commission on the Petition's consistency with the State Plan within 45 days after receipt of the requested information.

Requested Additional Information

Mixed-use, center based development

A Center is defined in the Preliminary State Development and Redevelopment Plan (page 31) as "an efficient and compact form of development having one or more mixed-use cores and residential neighborhoods and green spaces. Center designations are based on the area, population, density and employment of the center being considered and the features of the surrounding areas."

As you are aware, centers may only be designated through the municipal plan endorsement process. However, as we review the regional plan, the state agencies may provide a cursory approval of areas appropriate for growth, to provide a framework for municipalities to seek center designation through plan

endorsement subsequent to endorsement of the regional plan. Therefore, in order to provide a cursory review of the proposed growth areas in the petition, the County should provide justification for the proposed center boundaries in accordance with Appendix 6.2 of the Plan Endorsement Guidelines. I would also like to clarify that municipalities within the region that seek plan endorsement will not be required to designate a center that is identified as an area appropriate for growth in the regional plan, so long as the municipality can justify discrepancies with the endorsed regional plan and explain how the local plan remains consistent with the State Plan.

The petition recommends mixed-use development in areas proposed for growth, specifically in the proposed centers, activity areas and redevelopment areas, in order to decrease motor vehicle dependency and relieve congestion. However, the petition also cites resistance from some of the participating municipalities, particularly from Freehold, Manalapan, Howell and Marlboro Townships, to adoption of this type of land use planning and zoning. This reluctance to fully embrace center-based development that encompasses a full range of uses including residential, retail and commercial uses is problematic. Examples of such reluctance to include residential uses in areas proposed for center-based growth are listed below:

- Volume I of the plan, on pages 39-40, states, under Freehold Township Land Use, that “residential uses are not permitted in the Village Center Zone.” This is contrary to center-based design principles. Please elaborate and respond to this concern.
- Volume I of the plan, on page 42, under Marlboro Township Land Use, states “The Township is pursuing acquisition of the property...for redevelopment of core property for corporate offices...Limited residential uses are desired by the Township.”
- On page 60, the petition states that “Efforts to promote higher density residential development in selected areas, such as new centers, was resisted due to concerns about increased traffic and the need to construct new schools.”
- On pages 69-70, the petition states that “Similarly, due to concerns about high property taxes, there is often local resistance to increasing residential density anywhere within townships.”
- On pages 78-79, with regard to Manalapan Township’s Route 33 activity area, the petition states that “This activity area incorporates the village center zone, and is planned for retail uses.” As a Village Center, this area should properly include more than just retail uses.

The regional petition should acknowledge the discrepancies between the regional plan and the local plans, provide a narrative statement regarding how the regional petition remains consistent with the State Plan, and describe how the County will work with the municipalities to resolve these discrepancies.

In addition, an “activity area”, as identified in the Western Monmouth Development Plan, is not a recognized term within the State Plan. It seems that, this type of development pattern should evolve from auto-dependent locales into more fully realized mixed-use environments. The County should provide a comprehensive explanation of how this will occur.

Over-reliance on Route 9 for commercial activity

In addition, the petition suggests concentrating commercial development along Route 9 in Howell Township. Continued reliance on Route 9 and Route 33 for all commercial activity will further degrade the level of service (LOS) of these roadways and will prove counterproductive. Please provide an examination of alternatives to over-reliance on Route 9 for commercial activity.

The County and municipalities should also require additional local street networks in new development applications. These local networks should contribute to through-travel capacity in the region, beyond internal circulation within the new developments. The County should provide a narrative statement describing efforts to-date to work with the municipalities to develop local street networks in new development applications and provide a strategy regarding how the County will work with the municipalities to address this issue in the future.

Route 9 widening and treatment

The Plan (Volume II – Page 84 – under Route 9 Design) states that “the only means of ensuring acceptable traffic conditions on Route 9 is to expand it to six lanes and engage in costly intersection and interchange improvements.” This statement appears to contradict the statement on page 66 in the Regional Vision matrix, which states (in the first entry of the implementation column) that the “WMDP does not endorse widening of Route 9 to six lanes.” In Volume I (page 31 – future traffic conditions), the plan conveys the idea that the Development Plan, if implemented, can help reverse the trend scenario. Please clarify this idea to better set the stage for the discussion in Volume II about seriously examining alternatives to widening Route 9 and undertaking major intersection improvements.

Freight movement

The Planning and Implementation Agreement should include an item addressing the movement of freight in the region. This item should discuss the transport of freight to and from local commercial/retail/industrial facilities, as well as freight through-traffic.

Adequacy of water supply

Please discuss the adequacy of water supply in the region, particularly with regard to Farmingdale and Freehold Boroughs, as well as for the region in general.

Wastewater Management Plans

It is our understanding that an updated wastewater management plan is before the New Jersey Department of Environmental Protection (DEP). Please clarify the status of wastewater management plans for the region, as to whether they are up-to-date, and if they are not, please establish a firm timetable by which they will be current.

Please also provide an assessment of capacity at the wastewater treatment plants serving the region, including the Western Monmouth Utilities Authority plant and the Northern Water Pollution Control Facility (Ocean County), along with an assessment of the adequacy of the associated wastewater management plans.

Sewer Service Areas

As you are aware, the presence of sewer service in PA 3, 4, and 5 outside of centers is discouraged by the State Plan. Please provide justification for the presence of sewer service areas in Planning Areas 3, 4, and 5 and/or describe how this concern will be reconciled. It is our understanding that the pending wastewater management plan before DEP will more closely align sewer service areas with the goals of the State Plan. Specific details of this plan, particularly with regard to whether the areas of discrepancy within the sewer service area actually have an existence of sewer lines in the ground, approved plans for expansion or exist in name only will be helpful as we evaluate the regional plan for consistency with the State Plan.

Recreation / Open Space Facilities and Natural Resource Protection

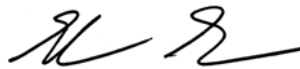
Please discuss the adequacy of recreational/open space facilities and natural resource protection plans and explain how they will achieve consistency with the State Plan for the Western Monmouth region. It is our understanding that the County has a newly adopted Open Space Plan which addresses some of these issues.

Conclusion

Pursuant to N.J.A.C. 5:85-7.5 (f), the County must submit the additional requested information identified above in order for the petition to be evaluated for consistency with the goals, policies and strategies of the State Plan. OSG and our state agency partners will continue to work with the County to revise the petition to include the items identified within this letter and help the County achieve Initial Plan Endorsement. Staff from our Office will reach out to you schedule a meeting in the near future to discuss next steps.

Thank you again for your commitment to the Plan Endorsement process. If you have any questions or concerns, please feel free to contact Russel Like, Area Planner for Monmouth County at (609) 292-6350 or via email at russel.like@dca.state.nj.us.

Sincerely,



Eileen Swan
Executive Director

ES:rl:dds

c: Robert Clark, Director, Monmouth County Planning Board
Ed Sampson, Supervising Planner, Monmouth County Planning Board
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